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1.0 INTRODUCTION

The United States, through the National Aeronautics and Space Administration (NASA), holds a fee simple interest in the Moffett Federal Airfield (MFA) and NASA Ames Research Center (NASA ARC). As the lead federal agency, NASA is responsible for compliance with the National Historic Preservation Act of 1966, as amended through 2006, including Section 106, 36 CFR Section 800, which requires federal agencies to take into account the effects of their activities and programs on historic properties.

1.1 PURPOSE

NASA has entered into an agreement with the United States Geological Survey (USGS) to acquire Parcel 15 within the US Naval Air Station (NAS) Sunnyvale Historic District on the NASA Ames Research Center (ARC) to build a new 2-story facility of approximately 50,000 sq ft called the M2M Lab Building to support relocating their research programs from their existing facility at their Menlo Park Campus.

1.2 PROJECT LOCATION

Parcel 15, the location for this project, is located at the southeast corner of the US NAS Sunnyvale Historic District within the NASA ARC. NASA ARC is located at the south end of San Francisco Bay, between the cities of Mountain View and Sunnyvale, in Santa Clara County, California approximately 27 miles southeast of San Francisco International Airport, and 6 miles northwest of San Jose International Airport. The US NAS Sunnyvale Historic District, also known as the Shenandoah Plaza National Historic District was listed in the National Register of Historic Places (NRHP) in 1994 (NRHP #94000045).

A Project Vicinity Map is included in Figure 1; a Location Plan is included in Figure 2, the Enlarged Location Plan is shown in Figure 3.

1.3 PROJECT TEAM

This study was prepared by James W. Shepherd, AIA, Principal and Director of Preservation and Susan Pommerer, AIA, Principal and Project Manager, SmithGroup, both of whom meet the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations (C.F.R.) Part 61) for Historic Architecture. The findings were prepared in consultation with Christopher R. Polglase, RPA, and Carrie Albee, MA, Gray & Pape, Inc., who meet the Secretary of the Interior's Professional Qualification Standards for Archaeology and Architectural History, respectively.

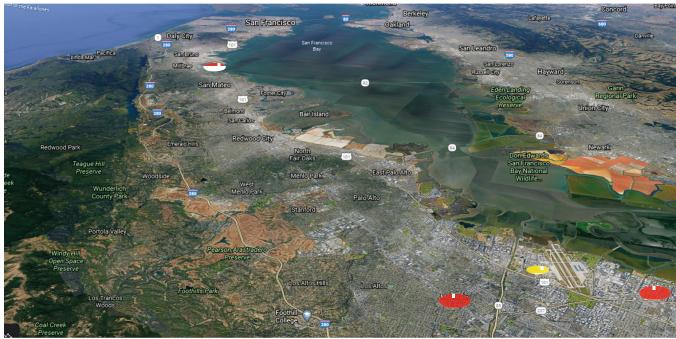


FIGURE 1: PROJECT VICINITY MAP - NASA AMES RESEARCH CENTER



FIGURE 2: LOCATION PLAN - NAS SUNNYVALE HISTORIC DISTRICT BOUNDARIES AND PROPOSED BUILDING LOCATION

567	Facilities Maintenance Warehouse	Building	1978	Υ	Not Eligible	No additional recommendation	Utilitarian, common type; No known or expected significance individually or within another district
570	Maintenance Storage (JCM)	Building	1996	Y	Not Eligible	No additional recommendation	Utilitarian, common type; No known or expected significance individually or within another district

4.4 AFFECTED HISTORIC PROPERTIES

US NAS Sunnyvale Historic District

The APE for this Undertaking is mostly within the NAS Sunnyvale Historic District (see Figure 5 – APE). This Historic District is spread over 124 acres and its 1994 NRHP included 22 contributing buildings/structures, 9 contributing houses with associated garages, and 3 monuments. The Historic District was expanded in 2013. The Historic District straddles the large open runways of the Moffett Federal Airfields with Hangars #2 & #3 being on the other side of those runways forming the remainder of the historic structures. Per Gray & Pape's assessment, seven contributors to this district, Buildings 001, 003, 005, 006, 010, 045, and 126 are located within the APE and represent the range of stylistic contributions to this Historic District. These buildings as well as the US NAS Sunnyvale Historic District are considered affected historic properties as part of this Undertaking.

The following content was redacted from this public posting:

Figure 24: Site Plan and Landscaping

The following content was redacted from this public posting:

Figure A-1: M2M Building - Site Plan - Showing Building Footprint, Setbacks and Landscaping Plan

APPENDIX C: SUPPORTING VISUAL EXHIBIT – RENDERINGS



FIGURE C-1: RENDERING 1 - M2M LAB BUILDING - VIEW OF SOUTHWEST CORNER SHOWING TWO TONED METAL CLADDING WITH WARM TAN COLOR COMPATIBLE WITH ADJACENT HISTORIC STUCCO. ALSO SHOWING RECESSED ENTRY PORTAL AND ENTRANCE PLAZA.



FIGURE C-2: RENDERING 2 - M2M LAB BUILDING - VIEW OF NORTHEAST CORNER SHOWING TWO TONED METAL CLADDING WITH WARM TAN COLOR COMPATIBLE WITH ADJACENT HISTORIC STUCCO. ALSO SHOWING RELATIONSHIP TO EXISTING HISTORIC WATER TOWER.



FIGURE C-3: RENDERING 3 - M2M LAB BUILDING - VIEW LOOKING NORTH ALONG DUGAN AVENUE SHOWING TWO TONED METAL CLADDING WITH WARM TAN COLOR COMPATIBLE WITH ADJACENT HISTORIC STUCCO.



FIGURE C-4: RENDERING 4 - M2M LAB BUILDING - VIEW LOOKING SOUTH ALONG DUGAN AVENUE SHOWING TWO TONED METAL CLADDING WITH WARM TAN COLOR COMPATIBLE WITH ADJACENT HISTORIC STUCCO.

APPENDIX D: SUPPORTING VISUAL EXHIBIT – VISUAL IMPACT ANALYSIS	



FIGURE D-1: KEY MAP OF VIEW IMPACT ANALYSIS LOCATIONS



FIGURE D-2: VIEW 1 - BEFORE - FROM SOUTH AKRON ROAD AT PARADE GROUND LOOKING EAST



FIGURE D-3: VIEW 1-AFTER - SHOWING OUTLINE OF M2M LAB BUILDING AS IT IS OBSCURED BY PLANTINGS AND OTHER BUILDINGS



FIGURE D-4: VIEW 2- BEFORE - SOUTH AKRON ROAD-SIDEWALK-LOOKING EAST

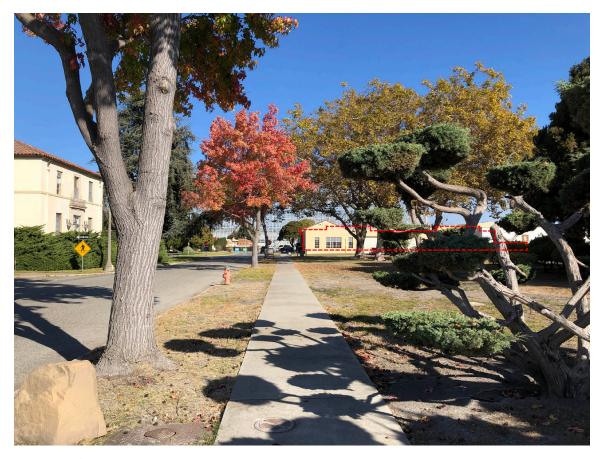


FIGURE D-5: VIEW 2 - AFTER - SHOWING OUTLINE OF M2M LAB BUILDING AS IT IS OBSCURED FROM SIGHT BY EXISTING BUILDINGS



FIGURE D-6: VIEW 3 - BEFORE - FROM SIDEWALK APPROACHING MC CORD AVE



FIGURE D-7: VIEW 3 AFTER - SHOWING OUTLINE OF M2M LAB BUILDING IS MOSTLY OBSCURED FROM SIGHT BY EXISTING BUILDING



FIGURE D-8: VIEW 4 - BEFORE - FROM BLDG 10 PLAZA



FIGURE D-9: VIEW 4 - AFTER - ONLY A SMALL PORTION OF M2M LAB BUILDING VISIBLE BETWEEN TWO EXISTING BUILDINGS



FIGURE D-9: VIEW 5 -BEFORE - VIEW FROM N AKRON RD & MC CORD AVE



FIGURE D-10: VIEW 5 -AFTER - M2M LAB BUILDING ENTRY PORTAL VISIBLE WITH THE REMAINDER OF THE BUILDING OBSCURED BY TREES AND EXISTING BUILDINGS.

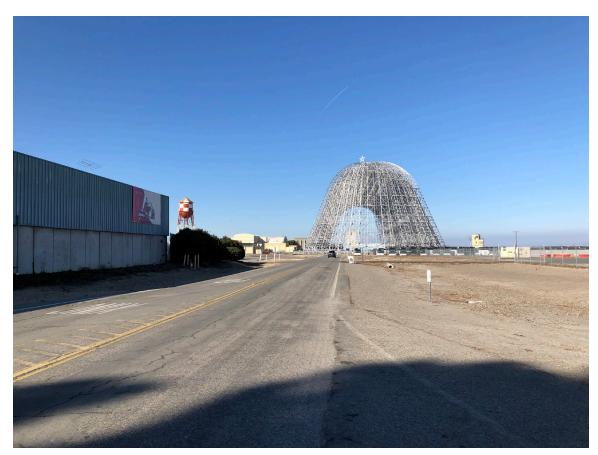


FIGURE D-11: VIEW 6 -BEFORE - VIEW FROM CODY RD LOOKING NORTH



FIGURE D-12: VIEW 6 - AFTER - M2M LAB BUILDING SHOWN IN OUTLINE AS IT IS OBSCURED BY EXISTING BUILDING



FIGURE D-13: VIEW 7 - BEFORE - VIEW FROM CODY RD LOOKING NORTH



FIGURE D-14: VIEW 7 - AFTER - M2M LAB BUILDING PARTIALLY OBSCURED BY EXISTING BUILDINGS



FIGURE D-15: VIEW 8 - BEFORE - VIEW FROM CODY RD LOOKING NORTH



FIGURE D-16: VIEW 8 - M2M LAB BUILDING WITH OUTLINE WHERE IT IS PARTIALLY OBSCURED



FIGURE D-17: VIEW 9 -BEFORE - VIEW FROM CODY & WESCOAT RD



FIGURE D-18: VIEW 9 - AFTER - M2M LAB BUILDING ALMOST FULLY OBSCURED BY EXISTING BUILDINGS



FIGURE D-19: VIEW 10 - BEFORE - VIEW FROM CUMMINS AVE



FIGURE D-20: VIEW 10 - M2M LAB BUILDING WITH OUTLINE SHOWING BUILDING MOSTLY OBSCURED BY EXISTING BUILDING



FIGURE D-21: VIEW 11 - BEFORE - VIEW FROM CUMMINS AVE & N AKRON RD

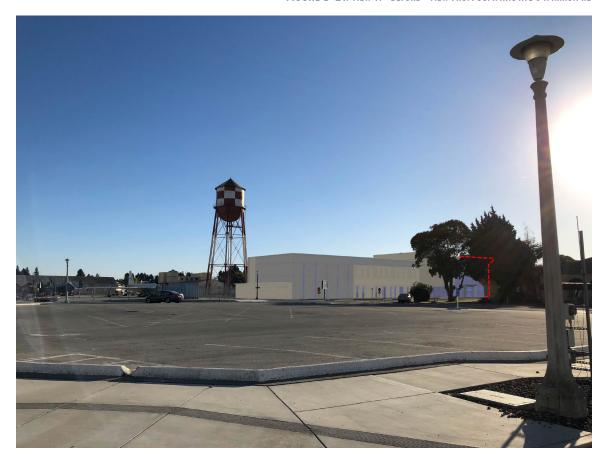


FIGURE D-22: VIEW 11 -AFTER - TWO THIRDS OF M2M LAB BUILDING VISIBLE



FIGURE D-23: VIEW 12 -BEFORE - VIEW FROM SEVERYNS AVE



FIGURE D-24: VIEW 12 - AFTER - M2M LAB BUILDING OUTLINED AS IT IS COMPLETELY OBSCURED BY TREES AND EXISTING BUILDINGS



FIGURE D-25: VIEW 13 - BEFORE - VIEW FROM COMMISSARY BLDG ENTRANCE



FIGURE D-26: VIEW 13 - AFTER - M2M LAB BUILDING OUTLINED AS IT IS ALMOST COMPLETELY OBSCURED BY EXISTING BUILDING

SUAL EXHIBIT – EXISTIN SUNNYVALE HISTORIC D	IG FEATURES AND MATERIALS IN	NAS



FIGURE E-1: HISTORIC DISTRICT UTILITARIAN ZONE MISSION REVIVAL FEATURES AND MATERIALS



FIGURE E-2: HISTORIC DISTRICT UTILITARIAN ZONE MISSION REVIVAL FEATURES AND MATERIALS

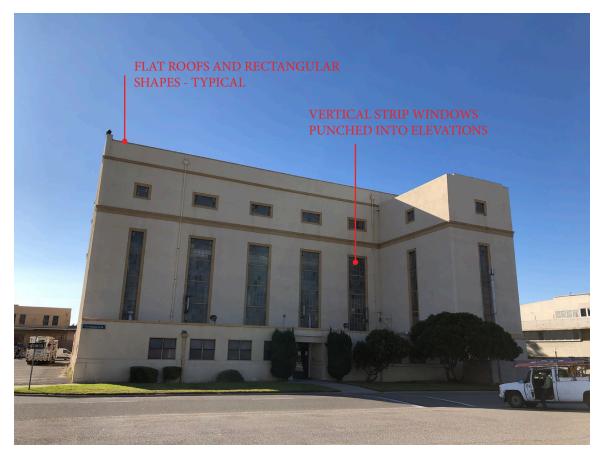


FIGURE E-3: HISTORIC DISTRICT UTILITARIAN ZONE MISSION REVIVAL FEATURES AND MAATERIALS



FIGURE E-4: HISTORIC DISTRICT UTILITARIAN ZONE MISSION REVIVAL FEATURES AND MATERIALS

APPENDIX F: CIVIL SITE PLAN

The following content was redacted from this public posting:

Figure F-1: Civil Site Plan

APPENDIX G: SELECT HISTORIC PHOTOS



FIGURE H-1: HISTORIC PHOTO CIRCA 1933



FIGURE H-2: HISTORIC PHOTO CIRCA 1943



FIGURE H-3: HISTORIC PHOTO CIRCA 1948



FIGURE H-4: HISTORIC PHOTO CIRCA 1993

APPEND	IX H: GRAY & PA	APE CULTURAL F	RESOURCES AS	SSESSMENT LE	TTER REPORT	



7508 Ridge Road Frederick, MD 21702 301.525.6631

Since 1987

April 5, 2021

Johnny Wong, Principal SmithGroup 301 Battery Street San Francisco, CA 94111

RE: Revised Section 106 Cultural Resources Assessment in Support of the Proposed United States Geological Survey M2M Lab Building within the NASA Ames Research Center, Sunnyvale, California

Dear Mr. Wong:

At your request, Gray & Pape, Inc. (Gray & Pape) has reviewed SmithGroup's December 16, 2020 report entitled U.S. Geological Survey M2M Lab Building NASA Ames Research Center Parcel 15 Section 106 Technical Report and offers the following assessment of cultural resources located in the project area. Gray & Pape understands that SmithGroup intends to consider these findings in preparing a revised submittal in response to input received from the National Aeronautics and Space Administration (NASA) Ames Research Center (ARC) personnel. This letter supplements suggested responses to comments and report edits provided by Gray & Pape to SmithGroup via email on February 17 and 18, 2021.

Professional Qualifications

The archaeological resource assessment was performed by Christopher Polglase, M.A., a Registered Professional Archaeologist with over 35 years of technical experience in the field who meets the Secretary of the Interior's (SOI) Professional Qualification Standards in Archaeology (36 CFR Part 61). The aboveground resource assessment was performed by Carrie Albee, M.A., who meets the SOI Professional Qualification Standards in Architectural History and has 24 years of technical experience in the field.

Archaeological Assessment

This archaeological assessment addresses NASA ARC's request for such an analysis prepared by a SOI-qualified archaeologist. The assessment is based upon a review of technical studies prepared for NASA ARC by AECOM during the past decade, including an archaeological resources study (dated February 2017) and an Integrated Cultural Resources Management Plan (ICRMP) (dated November 2014).

The NASA Ames Research Center Archaeological Resources Study was prepared by AECOM to provide guidance for archaeological resources management and project planning at ARC in support of NASA's obligations under the National Historic Preservation Act of 1966 (NHPA) and other federal mandates. The study identified the potential for archaeological resources at ARC through a review of prior surveys, previously recorded resources, historic maps, Sacred Land Files from the Native American Heritage Commission, and geotechnical investigations conducted at NASA ARC.

The AECOM study found that there are relatively few recorded archaeological sites within ARC and the potential for National Register of Historic Places (NRHP)-eligible resources is somewhat limited, due to

¹ AECOM, "NASA Ames Research Center: Archaeological Resources Study," February 2017.



the development of the site by the U.S. Navy and NASA during the twentieth century. The data reviewed by AECOM allowed their team to prepare a series of maps that illustrate areas of anticipated archaeological sensitivity. The AECOM study identified four tiers of archaeological sensitivity:

- Heightened Historic-Era Archaeological Sensitivity: This map illustrates generalized areas of
 heightened historic archaeological sensitivity based on the map-projected locations of historic
 farmsteads and other structures prior to 1931. These areas of sensitivity are focused primarily on
 farmsteads and/or mapped structures from the mid-nineteenth century to the first decade of the
 twentieth century.
- Heightened Prehistoric-Era Archaeological Sensitivity: This map illustrates generalized areas of
 heightened prehistoric archaeological sensitivity Areas that the AECOM team believe are most
 likely to contain prehistoric materials that existed prior to the development of the facility and where
 intact deposits or features might have survived the construction activities on the site.
- Heightened Geoarchaeological Sensitivity: This map illustrates generalized areas of heightened prehistoric archaeological sensitivity that the AECOM team believe are most likely to contain minimally disturbed buried prehistoric materials.
- Low Archaeological Sensitivity: Areas within NASA ARC that were not designated within the
 previous categories were determined to have a low potential for containing archaeological
 resources.

The study received concurrence from the California State Historic Preservation Office (SHPO) on June 22, 2017 as a baseline study for archaeological planning.

The site of the current Undertaking (i.e., proposed project) has not been subject to a previous archaeological survey. However, according to AECOM's analyses and as presented in Figure 16 of their report, the Undertaking is located in an area of Low Archaeological Sensitivity. The closest area of Heightened Prehistoric-Era Archaeological Sensitivity to Parcel 15 is located approximately 250 meters to the east, on the opposite side of Hanger 1 (Building 001). The closest area of Heightened Historic-Era Archaeological Sensitivity to Parcel 15 is located on the opposite side of Wescoat Road from Parcel. This area of Heightened Historic-Era Sensitivity reflects the map-projected location of one of a handful of widely scattered structure(s) illustrated in the 1876 Thompson and West Atlas and possibly on the 1897 USCGS Mountain View and Alviso T-Sheet. It should be noted that this area of archaeological sensitivity incorporates a 250-foot buffer from the actual map-projected location.

Based on the fact that the historic maps illustrate land use in the nineteenth century characterized by dispersed, widely scattered farmsteads, and given the anticipated large-scale earthmoving activities that would have been associated with construction of U.S. Naval Air Station (NAS), Sunnyvale, California during the 1930s, it is reasonable to expect that few features or deposits associated with a mid-to-late nineteenth farmstead would have survived within Parcel 15, if any features or deposits were once present. The prior development of Parcel 15 almost certainly would have significantly impacted prehistoric features or deposits that might have been located here prior to construction of NAS Sunnyvale. AECOM's characterization of the area around Parcel 15 as having low potential for containing significant archaeological resources is supported by our review of the available data.

Section 106 of the NHPA required Federal agencies to consider the effects of their undertakings on historic properties, which are specifically defined as those that are listed in or eligible for listing in the



NRHP. It is unlikely that the APE contains archaeological historic properties, and an archaeological survey does not appear to be warranted.

Aboveground Resource Assessment

Twelve (12) individual properties and one district are located within the APE for the proposed Project. All of the properties have been evaluated for listing in the NRHP as part of one or more of the following built resource studies, described in more detail in the NASA ARC ICRMP:

- National Register of Places District Nomination: US Naval Air Station Moffett Field (Urban Programmers, 1991), which resulted in the listing of the U.S. NAS Sunnyvale Historic District under Criteria A and C in 1994;
- Final Inventory and Evaluation of Cold War Era Historical Resources, Moffett Federal Airfield and NASA Crows Landing Flight Facility (SAIC, 1999), which determined 148 resources to be ineligible for listing;
- Hangar 1, Moffett Field Naval Air Station, Historic American Engineering Record (HAER) #CA-335 (Page & Turnbull, 2006); and
- Historic Property Survey Report for the Airfield at NASA Ames Research Center, Moffett Field, California (AECOM, 2013), which recommended expansion of the NAS Sunnyvale Historic District to include the airfield.

While several other built resource studies have been conducted at ARC, they did not address the properties within the Area of Potential Effects (APE) for the Undertaking. To date, no comprehensive gate-to-gate survey and NRHP evaluation of built resources at Ames has been conducted.

No field survey or original research was performed by the Gray & Pape in preparing this assessment. However, review of readily available information on the properties provided sufficient information to enable a good-faith preliminary identification of known and potential aboveground historic properties located within the APE. A brief summary of those findings is presented below.

U.S. NAS Sunnyvale, California Historic District (1930-1961)

Recommendation: Eligible per AECOM 2013

The U.S. NAS Sunnyvale, California Historic District (NRIS Reference No. 94000045) was listed in the NRHP in 1994 for its association with the expanding defense capabilities of the U.S. Navy, the engineering technology found in lighter than air ships, the design of the hangar and system for porting the dirigible and in the plan and architectural style of the station designed to support this defense technology. The district was found to possess national significance under Criteria A and C in the areas of Military and Engineering, with two periods of significance from 1930-1935 and 1942-1946. In 2013, AECOM conducted a survey and NRHP evaluation of the airfield at Ames and recommended that the NRHP-listed historic district should be expanded to include the airfield, and the period of significance extended from 1930-1961.

For the purposes of this Section 106 submission, Gray & Pape recommends that the U.S. NAS Sunnyvale, California Historic District be defined as presented in the 2013 AECOM report.

Building 001 - Hangar One (1933)

Recommendation: Individually eligible, contributing to district



Hangar One has been extensively researched and recorded over the past 30 years for its engineering significance and for its role in housing the Naval airship U.S.S. MACON dirigible. According to the HAER documentation it has been determined individually eligible for listing in the NRHP and it is a contributing resource to the U.S. NAS Sunnyvale, California Historic District.

Gray & Pape concurs with these determinations and recommends that for the purposes of this Section 106 submission, Hangar One be treated as individually eligible and a contributing resource to the identified historic district.

Building 003 - Training & Conference Center (1933)

Recommendation: Contributing to district

In a 1933 landscape plan for the NAS Sunnyvale, the building shown in this location is identified as a café. Later it became the officers club. The existing building on the site, constructed in 1933, exhibits the design characteristics of a Spanish Mission-style hacienda, although it is clear from looking at the building in its current condition, and historic aerial imagery, that it has been expanded from its original configuration. The 1991 NRHP nomination form for the historic district identifies Building 003 as non-contributing due to lack of integrity. There is no indication from data available to Gray & Pape that the contributing status of the resource has been reconsidered since 1991, nor that potential eligibility under other contexts has ever been evaluated.

Based upon the limited information available to Gray & Pape, Building 003 is understood to have performed an integral function to NAS Sunnyvale. While the resource exhibits substantial alteration from its original 1933 configuration, it is not clear to what extent the alterations may or may not fall within the expanded period of significance for the historic district. Photographic sources suggest that the building retains enough of its character-defining features to convey its historic use and to contribute to the historic district.

As an individual resource, it is not likely that Building 003 would be NRHP eligible. As a Spanish Mission Revival-style building, it is typical of military installations of the period and it is not known to be an outstanding or well-preserved example of the style. Its known functions since its construction – café, officers' club, conference center – are commonplace support functions within the context of military, and subsequently NASA, operations.

For the purposes of this Section 106 submission, Gray & Pape recommends that Building 003 be treated as a contributing resource to the U.S. NAS Sunnyvale, California Historic District.

Building 005 – Water Tower & Storage (1932)

Recommendation: Contributing to district

Building 005 is the original water tower for the NAS Sunnyvale. Now abandoned in place, the tower is a readily-identifiable and distinctive feature from the first period of construction at Ames that appears to have been little changed since then. The 1991 NRHP nomination form for the historic district identifies Building 005 as a contributing resource. There is no indication that the contributing status of the resource has been reconsidered since 1991, nor that potential eligibility under other contexts has ever been evaluated.

Based upon the limited information available to Gray & Pape, Building 005 performed an integral albeit utilitarian function within the NAS Sunnyvale. As an individual resource, it is visually and functionally commonplace to military installations of the period and is not expected to possess significance independently of the historic district.



For the purposes of this Section 106 submission, Gray & Pape recommends that Building 005 be treated as a contributing resource to the U.S. NAS Sunnyvale, California Historic District.

Building 006 - Mixed Use Warehouse (1933)

Recommendation: Contributing to district

In a 1933 landscape plan for the NAS Sunnyvale, Building 006 is identified as "Motor Test Building." Its proximity to Hangar One suggests that the function directly supported the operation of the U.S.S. MACON dirigible, which was powered by eight German-made Maybach VL II 12-cylinder, 560 hp (418 kW) gasoline-powered engines that drove outside propellers. Later functions include recycling and storage. As originally designed and built, Building 006 was a boxy, windowless, utilitarian building with only the buff-colored stucco exterior to link it visually to the Spanish Mission-style campus. In its current condition, the original square-plan building incorporates utilitarian extensions projecting from the northwest and southwest elevations that date from after World War II. The 1991 NRHP nomination form for the historic district identifies Building 006 as non-contributing, due to lack of integrity. There is no indication that the contributing status of the resource has been reconsidered since 1991, nor that potential eligibility under other contexts has ever been evaluated.

Based upon the limited information available to Gray & Pape, Building 006 is understood to have performed an integral function to the NAS Sunnyvale during the short period of operation of the U.S.S. MACON. While the resource exhibits substantial alteration from its original 1933 configuration, it is not clear to what extent the alterations may or may not fall within the expanded period of significance for the historic district. Photographic sources show that the original portion of the building is identifiable and intact, suggesting that the core of the building retains enough of its character-defining features to contribute to the historic district.

As an individual resource, it is not likely that Building 006 would be NRHP eligible individually, as it is a utilitarian support building with no known significant design or engineering aspects. Its function as recycling and storage in recent years further suggests a lack of individual significance, as these are commonplace support functions within the context of military, and subsequently NASA, operations.

For the purposes of this Section 106 submission, Gray & Pape recommends that Building 006 be treated as a contributing resource to the U.S. NAS Sunnyvale, California Historic District.

<u>Building 010 – Plant Engineering & Maintenance Shop (1932)</u>

Recommendation: Contributing to district

Building 010 is the original helium and boiler plant for NAS Sunnyvale, and as such has a direct relationship to the operation of the U.S.S. MACON. Documentary photographs show that the plant was immediately adjacent to helium storage structures and a natural gasholder, suggesting that the plant drew in natural gas from the gasholder, extracted the helium, and stored it until it was pumped to Hangar One via underground tunnels. After the termination of the Navy lighter-than-air program, it appears that the building retained its more typical function as a heating plant for the installation. Subsequent uses include maintenance shop and storage. The building incorporates Spanish Mission-style design elements and with the exception of the smokestack, which is no longer extant, has been little altered since its original construction. The 1991 NRHP nomination form for the historic district identifies Building 010 as a

³ Note that in the version of the NRHP nomination linked on ARC's website, Building 006 is identified as contributing. The reason for the discrepancy is unclear.



contributing resource. There is no indication that the contributing status of the resource has been reconsidered since 1991, nor that potential eligibility under other contexts has ever been evaluated.

Based upon the limited information available to Gray & Pape, Building 010 originally performed an important role in the operation of the U.S.S. MACON, and thereafter had an integral albeit utilitarian function as a heat plant within NAS Sunnyvale. As an individual resource, the plant is not expected to possess significance independently of the historic district. The Spanish Mission style is widespread in the region, nor is it known to be unique among heat plants at military installations of the period. Possible individual eligibility as a helium plant has been considered, but given that this function terminated by the 1940s, it is unlikely that the interior retains the equipment or configuration necessary to convey that significance.

For the purposes of this Section 106 submission, Gray & Pape recommends that Building 010 be treated as a contributing resource to the U.S. NAS Sunnyvale, California Historic District.

Building 010A - Chemical Feed & Storage for Bldg. 010 Boiler (1996)

Recommendation: Non-contributing to district

Building 010A is a very small utilitarian support structure located immediately adjacent to Building 010. While functionally it supports Building 010, a contributing resource to the historic district, its date of construction is well outside of the period of significance. There is no indication that Building 010A has ever been evaluated for NRHP eligibility under any context.

For the purposes of this Section 106 submission, Gray & Pape recommends that Building 010A be treated as a non-contributing resource to the U.S. NAS Sunnyvale, California Historic District.

Building 045 - Small Satellite Test Facility (1944)

Recommendation: Contributing to district

No information on the original function or history of this building was found during this study. According to NASA's records it was built in 1944, and this is supported by documentary photographs from the period. In the 2000s the resource was described as the Public Works Paint Shop. The 1991 NRHP nomination form for the historic district identifies Building 045 as a non-contributing resource, but no reason is provided. The building is not explicitly addressed in AECOM's proposed historic district expansion, as the resource was outside of the airfield study area. There is no indication that the contributing status of the resource has been reconsidered since 1991, nor that potential eligibility under other contexts has ever been evaluated.

For the purposes of this Section 106 submission, Gray & Pape recommends that Building 045 be treated as a contributing resource to the U.S. NAS Sunnyvale, California Historic District.

<u>Building 126 – Moffett Field Historical Society (1949)</u>

Recommendation: Contributing to district

The Cold War study, completed in 1999, describes Building 126 as "three pre-fabricated metal gable-roofed interconnected buildings set on a concrete foundation." It indicates that the building was originally used as a warehouse, and later as a railroad museum and storage. The study evaluated the NRHP eligibility of Building 126 under Criteria Consideration G, only, and determined the resource to be ineligible under the Cold War context (1946-1989).

The 1991 NRHP nomination form for the historic district identifies Building 126 as a non-contributing resource, presumably because it was constructed outside the period of significance. The building is not



explicitly addressed in AECOM's proposed historic district expansion, as the resource was outside of the airfield study area. There is no indication that the contributing status of the resource has been reconsidered since 1991, nor that the potential eligibility under contexts other than the Cold War has ever been evaluated.

Recent photographs show that Building 126 is typical of semi-permanent military construction of the 1940s, and that it retains integrity to that period. As such, the building is not likely to possess historical significance individually under Criterion C. Nor is the building known to have supported a significant function that would merit consideration outside of the historic district.

For the purposes of this Section 106 submission, Gray & Pape recommends that Building 126 be treated as a contributing resource to the U.S. NAS Sunnyvale, California Historic District.

Building 503 - Partners Manufacturing & Prototype Facility (1966)

Recommendation: Not Eligible

The Cold War study indicates that at that time Building 503 was functioning as the Navy Exchange Service Station. Designed as a gas station by Rudolph & Sheeten and completed in 1966, the building, while utilitarian, reflects the influence of mid-twentieth-century stripped down Modernism, typical of Federal construction of the period. The study evaluated the NRHP eligibility of Building 503 under Criteria Consideration G, only, and determined the resource to be ineligible under the Cold War context (1946-1989). Building 503 is outside of the original and expanded boundaries of the U.S. NAS Sunnyvale, California Historic District, and as such was not addressed in the 1991 or 2013 district studies. There is no indication that the potential eligibility of the resource under contexts other than the Cold War has ever been evaluated.

Little information on Building 503 was available for this preliminary evaluation, nor were current photographs of the resource and its context reviewed. NASA real property records indicate that while identified as a single asset, Building 503 consists of one large building and several ancillary buildings and/or structures of unknown construction date. It is not clear if the ancillary resources predate the current use of the facility (i.e., Partners Manufacturing & Prototype Facility). Based upon information contained in the Cold War study resource form, Building 503 was a typical fueling station on a military installation, and as such is not likely to be individual eligible for listing in the NRHP.

For the purposes of this Section 106 submission, Gray & Pape recommends that Building 503 be treated as individually ineligible for listing in the NRHP.

Building 510 – Administrative Building (1967)

Recommendation: Non-contributing to district; Not Individually Eligible

Building 510 occupies the former location of helium storage structures that originally supported the helium plant (Building 010). As the Navy's lighter-than-air program terminated in the 1940s, it is likely that the helium storage structures were demolished, and the site remained vacant until the construction of Building 510 in 1967. The Cold War study describes Building 510 as "two interconnected pre-fabricated ribbed metal buildings with medium-pitched gable roofs." It indicates that the building's original use is unknown and at the time served as a NASA maintenance office. The study evaluated the NRHP eligibility of Building 510 under Criteria Consideration G, only, and determined the resource to be ineligible under the Cold War context (1946-1989).

Building 510 is outside of the original and expanded periods of significance of the U.S. NAS Sunnyvale, California Historic District, and as such would not contribute to the district. There is no



indication that the potential eligibility of the resource under contexts other than the Cold War has ever been evaluated.

As an individual resource, it is not likely that Building 510 would be NRHP eligible individually, as it is a utilitarian support building with no known significance. Its function as maintenance and administrative office space in recent years further suggests a lack of individual significance, as these are commonplace support functions within the context of military, and subsequently NASA, operations.

For the purposes of this Section 106 submission, Gray & Pape recommends that Building 510 be treated as a non-contributing resource to the U.S. NAS Sunnyvale, California Historic District, and individually ineligible for listing in the NRHP.

Building 567 – Facilities Maintenance Warehouse (1978)

Recommendation: Non-contributing to district; Not Individually Eligible

Located immediately adjacent to the former helium plant (Building 010), Building 567 occupies a space originally planned for helium storage, but documentary photographs indicate that the land remained vacant until the 1950s. It appears that Building 567 replaced this earlier 1950s building, whose function is unknown. The Cold War study describes Building 567 as "a pre-fabricated ribbed metal building with a shallow-pitched metal roof," that originally served as a warehouse and was at the time being used as a public works warehouse. The study evaluated the NRHP eligibility of Building 567 under Criteria Consideration G, only, and determined the resource to be ineligible under the Cold War context (1946-1989).

Building 567 is outside of the original and expanded periods of significance of the U.S. NAS Sunnyvale, California Historic District, and as such would not contribute to the district. There is no indication that the potential eligibility of the resource under contexts other than the Cold War has ever been evaluated.

As an individual resource, it is not likely that Building 567 would be NRHP eligible individually, as it is a utilitarian support building with no known significance. Pre-fabricated metal warehouses like this one are commonplace within the context of military, and subsequently NASA, operations.

For the purposes of this Section 106 submission, Gray & Pape recommends that Building 567 be treated as a non-contributing resource to the U.S. NAS Sunnyvale, California Historic District, and individually ineligible for listing in the NRHP.

Building 570 – Maintenance Storage (JCM) (1996)

Recommendation: Non-contributing to district; Not Individually Eligible

Building 570 is a very small utilitarian support structure located immediately adjacent to Building 010. The Cold War study describes Building 570 as "a square flat-roofed building covered with metal panels" constructed in 1978 and at the time used as maintenance storage. The study evaluated the NRHP eligibility of Building 570 under Criteria Consideration G, only, and determined the resource to be ineligible under the Cold War context (1946-1989).

Building 570 is outside of the original and expanded periods of significance of the U.S. NAS Sunnyvale, California Historic District, and as such would not contribute to the district. There is no indication that the potential eligibility of the resource under contexts other than the Cold War has ever been evaluated.



As an individual resource, it is not likely that Building 570 would be NRHP eligible individually, as it is a utilitarian support building with no known significance. Pre-fabricated metal storage sheds like this one are commonplace within the context of military, and subsequently NASA, operations.

For the purposes of this Section 106 submission, Gray & Pape recommends that Building 570 be treated as a non-contributing resource to the U.S. NAS Sunnyvale, California Historic District, and individually ineligible for listing in the NRHP.

Conclusion

Gray & Pape's research herein was designed to address questions related to the archaeological sensitivity of Parcel 15 and the potential NRHP eligibility of built resources within the project's APE. The assessment provides assessments completed by SOI-qualified professionals. We understand that SmithGroup will incorporate these findings in an updated Section 106 report for the proposed USGS M2M Lab Building within NASA ARC.

We trust that these assessments are responsive to your needs at this time. If you should have any questions or need additional information, please do not hesitate to contact Christopher Polglase at +1 301 525 6631 (mobile), or cpolglase@graypape.com.

Best regards,

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